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Kathleen B. LevitzVice President-Federal Regulatory

March 12, 1999

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EX PARTE

Ms. Magalie Roman Salas Secretary Federal Communications Commission The Portals 445 12th S.W., Room TWB-204 Washington, D.C. 20554



Re: CC Docket No. 98-147

Dear Ms. Salas:

On March 11, 1999, Steve Klimacek, Bill McNamara, Pam Tipton and I met with the Commission staff to discuss issues arising in the Commission's advanced technologies docket. The staff with whom we met included: Kevin Martin, Legal Advisor to Commissioner Furchtgott-Roth; Linda Kinney, Legal Advisor to Commissioner Ness; Paul Gallant, Legal Advisor to Commissioner Gloria Tristani; and Larry Strickling, Chief of the Common Carrier Bureau. The following Common Carrier Bureau staff persons also attended some or all of the meeting with Mr. Strickling: Robert Atkkinson; Donald Stockdale; Jane Jackson; Carol Mattey; and Michael Pryor.

Our discussions focused upon issues raised in Docket 98-147 relating to physical collocation in BellSouth central offices and remote locations and to imposing Section 251(c)(4) resale obligations on xDSL offerings that an ILEC makes on only a wholesale basis. The attached documents formed the basis for the BellSouth presentation.

In compliance with the Commission's rules, I am filing two copies of this notice and ask that you associate this notification with the proceeding identified above.

Sincerely,

Kathleen B. Levitz

Vice President – Federal Regulatory

Kathleen & Levitz

Attachments

cc:

Linda Kinney

Larry Strickling

Jane Jackson

Paul Gallant

Robert Atkinson

Carol Mattey

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Kevin Martin Donald Stockdale Michael Pryor

CC Docket 98-147 Ex Parte

BellSouth Telecommunications, Inc.
March 11, 1999

Central Office Collocation

What BellSouth is doing:

- ✓ Common area collocation, including cageless collocation
- ✓ Real time information on space availability on per request basis
- ✓ Web-based report on space exhaust, updated within 1 week of filed petition
- ✓ Collocation of DSLAM equipment in virtual and physical collocation
- ✓ Collocation of switching equipment in physical collocation

◆ State Commissions have diligently addressed collocation standards

- ✓ Florida has established interval guidelines, is actively examining space exhaust/exemption process
- ✓ Georgia is examining current issues and comprehensive terms and conditions in upcoming workshop
- ✓ Louisiana has workshops in progress addressing intervals and performance measurements
- ✓ Kentucky and North Carolina have ordered collocation options

◆ The Commission should not preempt the work of state commissions

Central Office Collocation

Equipment

- The Commission should exercise caution in removal of equipment restrictions
 - ✓ There should be no unilateral requirement to allow switching equipment, particularly in virtual collocation, due to maintenance/servicing concerns, space allocation and grounding issues.
 - ✓ Limitation to "equipment necessary for interconnection or access to UNEs", which necessarily allows xDSL electronics, such as DSLAMs, are reasonable.
 - ✓ The Commission should decline to require collocation of equipment used to provide enhanced services.

Space Allocation

- Cumbersome reporting requirements will not accomplish the Commission's goal of efficient use of space or providing information useful to CLECs.
 - ✓ Timely reporting of space exhaust via the web or upon request will meet this goal
 - ✓ In order for a report of space availability to be meaningful to CLECs, it must address the availability of space and infrastructure for a particular CLEC's configuration.
- BellSouth supports upholding the Commission's existing rules on space warehousing.

Central Office Collocation

Intervals

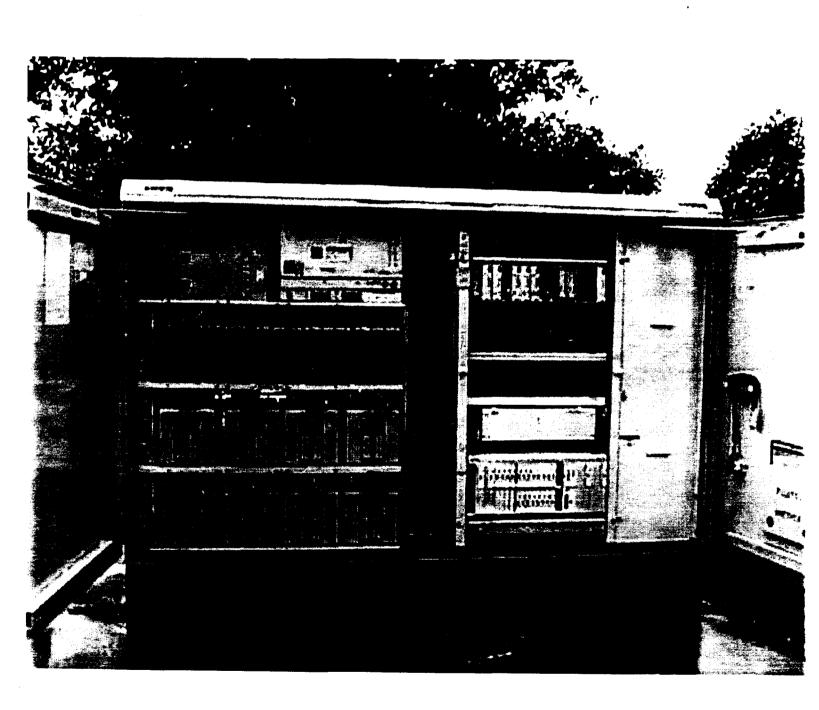
- The Commission should not establish presumptive intervals
 - ✓ Such intervals would be arbitrary and could not take into account regional/state-specific anomalies such as rigorous permitting requirements.
 - ✓ National standards step over state-established guidelines and procedures.
 - ✓ State commissions are in a better position to determine on a case by case basis whether BellSouth is delaying collocation.
 - ✓ Establishing interval national guidelines instead of focusing on performance management and measurement is an illusory approach to meeting the Commission's goals.

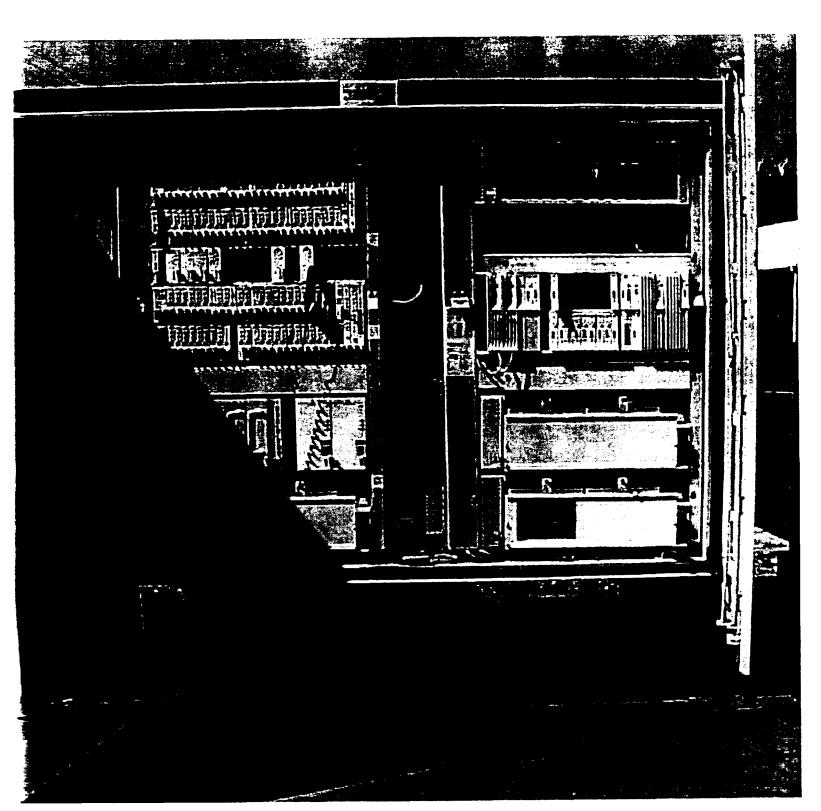
Remote Terminal Collocation

- ♦ Because this issue is tied to sub-loop unbundling, the Commission should defer resolution until the "necessary and impair" issues are resolved
- ◆ Collocation in remote terminals should be required only on a case-by-case basis where technically feasible because of
 - ✓ limited space in remote terminals
 - ✓ severe power and heat dissipation in cabinets
 - ✓ security concern
- ◆ BellSouth has successfully negotiated agreements using a cross-box to cross-box interconnection arrangement

Resale Requirements

- ◆ Section 251(c)(4) resale obligations only apply if the service is offered at retail
- ◆ BellSouth's ADSL service is clearly not a retail service





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